

Morse, Bob

From: Morse, Bob
Sent: Tuesday, April 02, 2019 3:51 PM
To: 'Battaglia, Randall W CIV USARMY CENAN (USA)'; Melissa Sweet (Melissa.Sweet@dec.ny.gov)
Cc: Pommerenck, Derek A CIV USARMY CEHNC (USA); Badik, Beth; Belanger, Todd; Hodges, Barry A CIV USARMY CEHNC (US); Roos, Allen D CIV USARMY CENAN (US); Pocze, Doug
Subject: RE: PFAS ESI Workplan status

Randy,

To clarify, there have been emails from and conversations with you stating that the Army will (EVENTUALLY) conduct an RI and PA for PFAS per EPA's previous requests. I took that to mean depot-wide for both. Ostensibly the RI would be based on an SI of the 2 fire training areas (SEADs 25 and 26), and SIs of any other areas identified in a depot-wide PA as needing further PFAS investigation. Based on what other DoD branches have done, the purpose of the SIs would only be to identify presence/absence of PFAS in all potential media at the sites. It's possible that I have not specifically mentioned SIs to you in previous emails, but I know I have mentioned them to you in conversations. Other military branches have used SIs as a way to do further investigations without going to a full RI. Doing that provides not only more information about the existence of PFAS but provides some degree of added protection of human health and the environment. Furthermore, SIs are also normal precursors to RIs. As I have stated to you, I understand the difficulty of conducting an RI without promulgated standards. That is why the word "eventually" is in parentheses above.

The Army should conduct additional SI sampling at SEADs 25 and 26 to address EPA's request to sample soil and the lower aquifer there. EPA notes that you have stated that funding for that is not available now. Therefore, EPA requests that the Army try to obtain the necessary funding as soon as possible. Funding should also be requested for the depot-wide PA and any resulting additional SIs.

A depot-wide PA is needed as soon as possible to start the process described above. It can be done concurrent with the ongoing ESI at SEADs 25 and 26.

Also, you had previously indicated to me that EPA could request in its comments on the ESI Work Plan that the Army conduct a well survey, and that the Army would do so. Please confirm that this is still the Army's intention.

With respect to funding, that is in many regards a separate issue from committing to take specific actions. You sent an email to EPA stating that you had requested funding for a PA and RI, and it appeared likely that funding might be obtained in 2019. Based on that statement, I am not holding you to the successful procurement of funding in 2019. Please keep us apprised of funding results for all of the above-mentioned work.

Please let me know if you have any questions. Thank you.

Bob

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-----Original Message-----

From: Battaglia, Randall W CIV USARMY CENAN (USA) <Randy.W.Battaglia@usace.army.mil>

Sent: Monday, April 01, 2019 12:04 PM

To: Morse, Bob <Morse.Bob@epa.gov>; Melissa Sweet (Melissa.Sweet@dec.ny.gov) <Melissa.Sweet@dec.ny.gov>

Cc: Pommerenck, Derek A CIV USARMY CEHNC (USA) <Derek.Pommerenck@usace.army.mil>; Badik, Beth <Beth.Badik@parsons.com>; Belanger, Todd <Todd.Belanger@parsons.com>; Hodges, Barry A CIV USARMY CEHNC (US) <Barry.A.Hodges@usace.army.mil>; Roos, Allen D CIV USARMY CENAN (US) <Allen.D.Roos@usace.army.mil>; Pocze, Doug <Pocze.Doug@epa.gov>

Subject: RE: PFAS ESI Workplan status

Bob,

I have funding only for the ESI; no additional efforts are funded at this time.

Under CERCLA and the Army's restoration program, I can commit to performing work as needed and routinely request/program and obtain the funding. I assumed that PFAS would follow the normal process.

Noting your comments below, I need to caveat committing the Army for additional PFAS work at this time.

In discussing the ESI internally, I was informed that additional PFAS actions (and funding) involve decisions that are above the BRAC Division.

The reasons were primarily that as an emerging contaminant, there are no promulgated standards, action levels, it is not a hazardous substance, etc.

My understanding is that this may mean simply that funding is on a case by case basis, such as based upon potential for exposure.

This also does not mean that the Army will not fund additional actions. It may mean simply that it will wait until the results of the ESI.

My primary office phone number is now: 347-213-1565

Randy Battaglia

Project Manager

Seneca AD BRAC Environmental Coordinator/Caretaker New York District CENAN-PP-E

-----Original Message-----

From: Morse, Bob [mailto:Morse.Bob@epa.gov]

Sent: Friday, March 29, 2019 12:57 PM

To: Battaglia, Randall W CIV USARMY CENAN (USA) <Randy.W.Battaglia@usace.army.mil>; Melissa Sweet (Melissa.Sweet@dec.ny.gov) <Melissa.Sweet@dec.ny.gov>

Cc: Pommerenck, Derek A CIV USARMY CEHNC (USA) <Derek.Pommerenck@usace.army.mil>; Badik, Beth <Beth.Badik@parsons.com>; Belanger, Todd <Todd.Belanger@parsons.com>; Hodges, Barry A CIV USARMY CEHNC (US) <Barry.A.Hodges@usace.army.mil>; Roos, Allen D CIV USARMY CENAN (US) <Allen.D.Roos@usace.army.mil>; Pocze, Doug <Pocze.Doug@epa.gov>

Subject: [Non-DoD Source] RE: PFAS ESI Workplan status

Randy,

EPA has reviewed the final PFAS ESI Work Plan and the Army Response To Comments on the draft Work Plan.

The Army's revisions and responses are adequate for the purposes of the planned May fieldwork.

While it would be preferable that the Army conduct the requested soil and lower aquifer sampling as part of the May sampling effort, EPA notes that the Army has committed to doing that work in the future as part of additional RI fieldwork. It is EPA's understanding that the Army has also committed to conducting a depot-wide RI based on the results of a planned depot-wide PA.

Also, the Army's response to NYSDEC Comment # 5 states that a draft ESI Report is planned for submission in November 2019. In the event that the off depot well survey that is to be part of the ESI has not been completed by that time, EPA requests that the Army not hold up submission of the draft ESI Report until the well survey has been completed. If the well survey has not been completed and complied when the ESI Report is complete, it is suggested that the Army submit the well survey later as an addendum to the ESI Report.

With respect to EPA's Comment # 3 (EPA request for a well survey to be conducted on the former depot property), please provide the source the source of the information contained in the Army's response. Please note that based upon the Army's response to this question, a more formal on-depot well survey may still need to be conducted as per EPA's original request in Comment # 3.

Please let me know if you have any questions. Good luck with the proposed field work.

Bob

-----Original Message-----

From: Battaglia, Randall W CIV USARMY CENAN (USA) <Randy.W.Battaglia@usace.army.mil>

Sent: Friday, March 29, 2019 10:38 AM

To: Morse, Bob <Morse.Bob@epa.gov>; Melissa Sweet (Melissa.Sweet@dec.ny.gov) <Melissa.Sweet@dec.ny.gov>

Cc: Pommerenck, Derek A CIV USARMY CEHNC (USA) <Derek.Pommerenck@usace.army.mil>; Badik, Beth <Beth.Badik@parsons.com>; Belanger, Todd <Todd.Belanger@parsons.com>; Hodges, Barry A CIV USARMY CEHNC (US) <Barry.A.Hodges@usace.army.mil>; Roos, Allen D CIV USARMY CENAN (US) <Allen.D.Roos@usace.army.mil>

Subject: PFAS ESI Workplan status

Bob/Melissa,

As you know we submitted the response to comments and Final Workplan for the ESI on 14 February. We need to know if this is accepted or if there are additional comments or issues.

We have scheduled the ESI field work, well drillers, and sampling for May and need to know if we can proceed.

My primary office phone number is now: 347-213-1565

Randy Battaglia

Project Manager

Seneca AD BRAC Environmental Coordinator/Caretaker New York District CENAN-PP-E